

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In Re:)	Case No.:	18-24469
Bette B. Leibowitz)		
)		
)		
)	Chapter 13	
)		
)		

NOTICE OF OBJECTION

The undersigned, GETLER, GOMES & SUTTON, P.C., attorneys for Secured Creditor SB One Bank, successor by merger to Community Bank of Bergen County, NJ the holder of a Mortgage on the debtor's premises at 18 Raritan Reach Road, South Amboy, New Jersey, hereby objects to the confirmation of the debtor's proposed Modified Chapter 13 Plan in the event the debtor fails to make the regular monthly mortgage payments to the Secured Creditor, outside of the Chapter 13 Plan, in accordance with the provisions of said Plan, in violation of 11 U.S.C. 1326.

Furthermore, the Secured Creditor objects to the plan provisions which call for payments at a value less than that provided for in the Note and loan documents, for the property listed in the plan.

Furthermore, the Secured Creditor objects to the provision in the debtors' plan which provides for the total payment of an amount less than the amount due the Secured Creditor as set forth in its Proof of Claim, for property listed in the plan.

Furthermore, the Secured Creditor objects to the plan because the debtor has not made his regular monthly mortgage payments outside the plan.

In the event the debtor cures the provisions of the plan which provide for reductions in payments and further cures the aforesaid payments due outside the Chapter 13 Plan prior to the Confirmation Hearing, the undersigned will not appear at the Confirmation Hearing and the aforesaid objection should be deemed waived.

GETLER, GOMES & SUTTON, P.C.
Attorneys for Secured Creditor
SB One Bank, as successor by merger to
Community Bank of Bergen County, NJ

/s/ Janine A. Getler
JANINE A. GETLER
MEMBER OF THE FIRM

Dated: August 21, 2018